

Ex. B

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEW JERSEY  
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5 IN RE JOHNSON & JOHNSON ) MDL No.  
6 TALCUM POWDER PRODUCTS ) 16-2738 (FLW)(LHG)  
7 MARKETING SALES PRACTICES, )  
8 AND PRODUCTS LIABILITY )  
9 LITIGATION )

10 )

11 THIS DOCUMENT RELATES TO )

12 ALL CASES )

13 -----x

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VIDEOTAPED 30(b)(6) DEPOSITION OF DEFENDANT  
15 PERSONAL CARE PRODUCTS COUNCIL,  
by and through its Designated Representative,

16

MARK POLLAK

17

WASHINGTON, D.C.

18

WEDNESDAY, AUGUST 29, 2018

19

9:30 A.M.

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24 Reported by: Leslie A. Todd

1 scope.

2 THE WITNESS: And I don't know.

3 BY MR. GOLOMB:

4 Q And none of the documents that you  
5 reviewed to prepare for your deposition here today  
6 assisted you in that way?

7 A So, again, I -- if I recall,  
8 Nichols-Dezenhall was involved perhaps with a  
9 focus group. I know they had some involvement  
10 with the issue and made a proposal, but I...

11 Q Okay. If you assume for the purpose of  
12 my question that both the Weinberg Group and  
13 Nichols-Dezenhall were both hired around the time  
14 of -- in 2000 when the NTP was reviewing whether  
15 or not to include talc as a carcinogen, I want you  
16 to assume that to be true for the purposes of my  
17 question.

18 So as you sit here today, you've never  
19 read the Weinberg report as it relates to talc?

20 MR. LOCKE: Objection. Beyond the  
21 scope.

22 THE WITNESS: I don't recall ever seeing  
23 it.

24 BY MR. GOLOMB: